

May 17, 2001

**AUTOMATED SAFETY INCIDENT SURVEILLANCE AND TRACKING  
SYSTEM (ASISTS), THE ELECTRONIC SUBMISSION OF FORMS CA-1 AND CA-2**

**1. PURPOSE:** This Veterans Health Administration (VHA) Directive provides policy and guidelines for the implementation of the electronic submission of Form CA-1, Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation, and Form CA-2, Notice of Occupational Disease and Claim for Compensation, to the Department of Labor (DOL). This is to be done via the Automated Safety Incident Surveillance and Tracking System (ASISTS), the computerized system used by VHA facilities to track and monitor Occupational Safety and Health (OSH) incidents. **NOTE:** *This expanded functionality of ASISTS will be via the Veterans Health Information Systems Technology Architecture (Vista) software, Patch OOPS\*1.0\*8.*

**2. BACKGROUND**

a. In 1998, the Under Secretary for Health determined that enhancing VHA's ability to manage information on occupational illnesses and injuries was critical to improving the health and safety of VHA employees. To that end, the Under Secretary for Health approved the implementation and use of ASISTS to track and manage the data and information related to occupational injuries and illnesses.

b. VHA Directive 98-030 entitled "Automated Safety Incident Surveillance and Tracking System (ASISTS) with Needle Stick Tracking Module" was issued June 30, 1999. It directed VHA facilities to use ASISTS to track employee accidents, in general, and exposures to bloodborne pathogens from needle sticks and sharps, in particular. ASISTS has been in mandatory use by VHA facilities since February 1998. Directive 98-030 stated that a future phase of ASISTS would provide VHA facilities the capability to electronically transmit Form CA-1 and Form CA-2 to DOL.

c. When fully implemented at each VHA facility, ASISTS will provide essential information to significantly improve programs that manage occupational injuries and illnesses and associated Workers' Compensation (WC) expenditures. WC costs currently are about \$140 million annually. Analysis of the data gathered by ASISTS will assist in preventing future accidents by identifying trends and guiding proactive intervention and prevention programs. Electronic submission of Form CA-1 and Form CA-2 to DOL using ASISTS will result in improved delivery of WC benefits to employees that are injured or become ill as a result of their employment.

d. The electronic submission of Form CA-1 and Form CA-2 to DOL by VHA facilities is the basis for determining benefits that VHA employees will receive as a result of WC claims. It is essential that these submissions be consistent from one VHA facility to another. **NOTE:** *Training VHA employees, employee representatives, supervisors, WC program managers, and others in ASISTS is critical to achieving such consistency.*

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e. Training and other initiatives to assist in the implementation of the requirements of this Directive include an updated CD-ROM. The CD-ROM provides both detailed information on data entry to ASISTS that is needed to affect electronic submission of Form CA-1 and Form CA-2 forms to DOL and an updated user and technical manual. The latter takes users through the ASISTS process step-by-step. While these initiatives have been developed as a national effort, the Veterans Integrated Service Networks (VISNs) are responsible for developing VISN-wide plans to ensure that VHA facility employees and employee representatives are properly trained in the use of ASISTS for the electronic submission of Form CA-1 and Form CA-2 to DOL.

***NOTE:** Additional enhancements to ASISTS are planned for future implementation. These enhancements will both increase the utility of ASISTS and make it more "user friendly." A pilot project that provides for a graphical user interface (GUI) for ASISTS is currently underway.*

**3. POLICY:** It is VHA policy that the medical facility Director is responsible for ensuring that all occupational injury and illness information related to CA-1 and CA-2 forms, and related WC information, be electronically submitted to DOL using ASISTS.

### **4. ACTION**

a. VHA facilities must begin electronically transmitting Form CA-1 or Form CA-2 to DOL through the Austin Automation Center using the Electronic ata Interchange (EDI), as soon as possible, and no later than by June 30, 2001. For the limited circumstances where it is not possible for a VHA facility to implement full electronic submission of Form CA-1 or Form CA-2 via ASISTS by June 30, 2001, paper submissions may continue only until September 30, 2001. VISN WC Coordinators must review and approve the need for such paper submissions, on a case-by-case basis.

b. Individuals appointed to manage the WC aspects of ASISTS (see subpar. 4e (1) at VHA facilities must ensure that VHA facilities do not electronically transmit Form CA-1 or Form CA-2 to DOL for medical and dental residents who are paid through a disbursement agreement that includes WC. VHA facilities must submit Form CA-1 or Form CA-2 to DOL for medical and dental residents who are either paid through a disbursement agreement that does not include WC or paid directly by VA. VHA facilities must track occupational injury and illness for all medical and dental residents using ASISTS regardless of whether the resident is paid through a disbursement agreement or paid directly by VA. Immediate medical treatment and/or counseling of medical and dental residents must be provided and the disbursing agent and/or university program director notified of the injury or illness. All appropriate privacy regulations and requirements must be adhered to.

d. A printed copy of the completed Form CA-1 or Form CA-2 must be signed in ink by the employee, supervisor, and any witnesses prior to electronic transmission of the forms to DOL. Employees are to be provided a printed (hard) copy of the signed Form CA-1 or Form CA-2. The original Form CA-1 or CA-2 document shall be filed at the facility in accordance with DOL requirements.

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e. VHA facilities must report unexpected hardware or software (system) problems that preclude the electronic submission of Form CA-1 or Form CA-2 via ASISTS to VISN WC Coordinators. If it is determined that such problems cannot be corrected within a reasonable time, VHA facilities are to submit paper versions of Form CA-1 or Form CA-2, as necessary, to ensure the timely submission of employee claims to DOL.

f. The VISN WC Coordinators appointed by the VISNs for the WC Case Review are to coordinate the implementation of the software patch (Patch OOPS\*1.\*08) to ASISTS. This individual is responsible for developing a VISN-wide plan for implementing the electronic submission of Form CA-1 or Form CA-2, by VHA facilities. This includes:

(1) Developing a VISN-wide method to link ASISTS to DOL through the Austin Automation Center utilizing EDI technology.

(2) Developing VISN-wide training plans for VHA facility employees and supervisors in the use of ASISTS, to include training in computer skills as necessary for VHA facility employees to effectively use ASISTS.

(3) Developing quality assurance programs to measure the effectiveness of VHA facilities' use of ASISTS for the electronic submission of Form CA-1 or Form CA-2.

(4) Ensuring electronic signature functionality for all employees at VHA facilities.

(5) Assessing the need at VHA facilities for additional computer hardware and software capabilities to permit all VHA facility employees the access to computers that is needed to effectively input information to and otherwise utilize the employee menu functionality of ASISTS.

(6) Developing a schedule at each VHA facility to both implement the electronic submission of Form CA-1 or Form CA-2 to DOL by required dates and phase out the paper submission of these forms.

(7) Ensuring that ASISTS and all patches have been installed at VHA facilities and are actively being used.

b. **VHA Facility Directors.** VHA facility Directors are to:

(1) Appoint an individual to manage the WC aspects of ASISTS, including the electronic submission of Form CA-1 or Form CA-2 to DOL. VHA facilities that have a WC Program Manager must appoint this individual to manage the WC aspects of ASISTS.

(2) Ensure that ASISTS and all patches have been installed at their facility and are actively being used.

(3) Ensure that a multidisciplinary team has been appointed at the VHA facility to review reporting, tracking, and monitoring processes related to occupational injury and illness. **NOTE:** *This team must ensure that implementation of ASISTS satisfactorily accounts for actual incidents of*

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*occupational injury and illness at the VHA facility and that all claims are reported, as required by OWCP regulations, to DOL.*

(4) Establish an Accident Review Board (ARB). Best practices at VHA facilities having a low Lost-time Claims Rate (LTCR) clearly demonstrate that ARBs are a major factor in reducing the number of and recurrence of accidental injury. The ARB is to consist of senior VHA facility management, employee representatives (unions), and representatives from VHA facility programs responsible for employee health, safety, infectious diseases, engineering, environmental management, workers' compensation, and human resources.

(a) The ARB must:

1. At a minimum, review incidents of occupational injury and illness that result in medical expense or in lost time beyond the day of injury or illness.
2. Ensure that ASISTS is implemented at the facility and supports the review of the occupational injury and illness incidents that the ARB investigates.

(b) The ARB must be provided records (i.e., information) needed to review individual accidental injuries and illnesses. Information provided to an ARB member, to review individual incidents of occupational injury and illness, is provided as a routine use under the provisions of the Privacy Act.

1. Routine use with respect to the disclosure of records means that records will be used for a purpose that is compatible with the purpose for which it is collected. Routine use does not permit the release of information on incidents of occupational injury and illness including personal identifiers to other than ARB members and as requested by VHA facility management.

2. There are severe penalties for failure to comply with the Privacy Act's requirements related to routine use.

3. To ensure that members of the ARB perform their duties in conformance with Privacy Act requirements, VHA facility directors are to train ARB members in the requirements of the Privacy Act. This training shall include, as a minimum, the following topics:

(a) an overview of existing federal privacy laws and regulations (e.g., Privacy Act of 1974, Title 38 United States Code (U.S.C.) 5701; Title 38 U.S.C. 7332);

(b) specific VHA facility policy, if any, covering Privacy Act issues; and

(c) penalties for unlawful disclosure of records covered by the Privacy Act.

(5) Ensure that all employees have access to computers as needed to receive employee bulletins regarding occupational injuries and input information required by the employee menu portion of ASISTS.

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(6) Implement training programs as required by VISN-wide training plans and, as necessary, develop and implement VHA facility-specific training to meet the ASISTS training needs of the VHA facility.

c. VHA facilities are reminded to meet their local labor relations obligations prior to implementing this Directive.

d. Additionally, individual VHA employees that are injured or become ill as a result of their employment are to use ASISTS to enter the information regarding incidents of occupational injury and illness that is needed for electronic submission of Form CA-1 and Form CA-2 to DOL.

**5. REFERENCES:** None.

**6. FOLLOW-UP RESPONSIBILITY:** The Strategic Health Group for Environmental and Occupational Health (136) and the Chief Network Office (10NB) are responsible for VHA programs related to this Directive. The point of contact for clinical issues can be reached at (202) 273-8579; the point of contact for technical issues can be reached at (202) 273-5844. Questions on whether medical and dental residents are paid through a disbursement agreement that includes WC or paid directly by VA may be referred to the facility Associate Chief of Staff for Education (ACOS/E) or the Office of Academic Affiliations in VHA Headquarters at (202) 273-8946. The Strategic Health Group for Environmental and Occupational Health (136) has overall responsibility for ASISTS.

**7. RESCISSION:** This VHA Directive expires May 31, 2006.

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Under Secretary for Health

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